

USDA PRIVACY IMPACT ASSESSMENT FORM

Agency: USDA Forest Service

System Name: Forest Service Stewardship Program Web-Based Data Entry Tool (WebDET)

System Type: Major Application
 General Support System
 Non-major Application

System Categorization (per FIPS 199): High
 Moderate
 Low

Description of the System:

WebDET is a national web-based data entry and report writing geodatabase application designed to support the Forest Stewardship Program, administered by USDA Forest Service, and implemented/delivered by state forestry agencies. WebDET is an extension of the Forest Stewardship Program’s Spatial Analysis Project (SAP), a management tool customized by states to help them deliver their Forest Stewardship Program strategically and effectively. WebDET will allow field foresters, working with private landowners, to prepare Forest Stewardship Management Plans, record contact and other attribute information of the plan property, track plan implementation accomplishments, and spatially display and analyze plan locations and associated activities, through internet access, without the need for desktop GIS software or software expertise.

WinDET is an extension to the web-based tool, WebDET, as a desktop (runtime) application, allowing non-technical users to run an interface that mimics the preparation of Forest Stewardship Management Plan functionality as in WebDET, using packaged software specifically and solely intended for this use. This stand-alone application will run on a personal computer, disconnected from the internet. The target audience will be state stewardship coordinators, private contractors, and other state staff writing stewardship plans and performing other resource based activities that require documentation and upward reporting, and who either do not have access to adequate telecommunications connections or for some other reason choose not to access WebDET as a web-based tool. WinDET will ONLY mimic the plan-preparer capabilities of WebDET.

Who owns this system? (Name, agency, contact information)

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Who is the security contact for this system? (Name, agency, contact information)

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Who completed this document? (Name, agency, contact information)

The original PIA was completed by Xacta Corporation on November 17, 2006:

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This PIA was updated and completed on September 25-26, 2007 by:

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DOES THE SYSTEM CONTAIN INFORMATION ABOUT INDIVIDUALS IN AN IDENTIFIABLE FORM?

Indicate whether the following types of personal data are present in the system

QUESTION 1	Citizens	Employees
Does the system contain any of the following type of data as it relates to individual:		
Name	Yes	Yes
Social Security Number	No	No
Telephone Number	Yes	Yes
Email address	Yes	Yes
Street address	Yes	Yes
Financial data	No	No
Health data	No	No
Biometric data	No	No
QUESTION 2	No	No
Can individuals be uniquely identified using personal information such as a combination of gender, race, birth date, geographic indicator, biometric data, etc.?		
NOTE: 87% of the US population can be uniquely identified with a combination of gender, birth date and five digit zip code ¹		
Are social security numbers embedded in any field?	No	No
Is any portion of a social security numbers used?	No	No
Are social security numbers extracted from any other source (i.e. system, paper, etc.)?	No	No



If all of the answers in Questions 1 and 2 are NO,

You do not need to complete a Privacy Impact Assessment for this system and the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

3. No, because the system does not contain, process, or transmit personal identifying information.

¹ Comments of Latanya Sweeney, Ph.D., Director, Laboratory for International Data Privacy Assistant Professor of Computer Science and of Public Policy Carnegie Mellon University To the Department of Health and Human Services On "Standards of Privacy of Individually Identifiable Health Information". 26 April 2002.

If any answer in Questions 1 and 2 is YES, provide complete answers to all questions below.

DATA COLLECTION

3. Generally describe the data to be used in the system.

Customer address, property location – spatially displayed, land size, general description of the property/land, geopolitical information.

Plan Preparer information (name, address, e-mail address, and phone) will be included in the WebDET geodatabase. Plan preparers include both state forestry employees and private consultants.

Employee information for all other users will be included – name, address, phone, e-mail address.

4. Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.

- Yes
 No

5. Sources of the data in the system.

5.1. What data is being collected from the customer?

Address owner: name of owner, organization, address, phone, and email

Property address: assessor tax id, address, county, phone, email, legal description, directions to property, description of property.

Managed area: spatially displayed, land size, geopolitical information, recommended Forest Stewardship activities, accomplishments (were activities completed), and resource elements.

5.2. What USDA agencies are providing data for use in the system?

Forest Service

5.3. What state and local agencies are providing data for use in the system?

State and Island Territory Forestry Agencies

5.4. From what other third party sources is data being collected?

The application does not use third party sources when collecting data. The application pulls from a third-party mapping service for geographical (base map) information.

5.5. Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e. NFC, RD, etc.) or Non-USDA sources.

- Yes
 No. If NO, go to question 7

5.6. How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?

The application employs drop-down lists where appropriate, practical, and possible to minimize inconsistencies in data entry. General data integrity checks (rules of entry – i.e. units of measure, area, character vs. numeric fields, etc.) have been built into the application as error-checks. For example forested area (acres) cannot exceed total stewardship plan area (acres). In addition, completed data entries (completed Forest Stewardship Management Plans) will be reviewed for accuracy by Plan Approvers before uploaded into the central database as an approved record. Throughout the application, there are required fields in the database that need to be filled out before the record can be saved.

5.7. How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?

The application employs drop-down lists where appropriate, practical, and possible to minimize inconsistencies in data entry. General data integrity checks (rules of entry – i.e. units of measure, area, character vs. numeric fields, etc.) have been built into the application as error-checks. For example forested area (acres) cannot exceed total stewardship plan area (acres). In addition, completed data entries (completed Forest Stewardship Management Plans) will be reviewed for accuracy by Plan Approvers before uploaded into the central database as an approved record.

5.8. How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?

The application employs drop-down lists where appropriate, practical, and possible to minimize inconsistencies in data entry. General data integrity checks (rules of entry – i.e. units of measure, area, character vs. numeric fields, etc.) have been built into the application as error-checks. For example forested area (acres) cannot exceed total stewardship plan area (acres). In addition, completed data entries (completed Forest

Stewardship Management Plans) will be reviewed for accuracy by Plan Approvers before uploaded into the central database as an approved record.

DATA USE

6. Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?

The data in the application will be used to create and edit Forest Stewardship Management Plans, record contact and other attribute information of the plan property, track plan implementation accomplishments, and spatially display and analyze plan locations and associated activities and accomplishments.

USDA Forest Service will use aggregated information by state, and will not have access to view individual plans. The aggregated information will be used to summarize plans, planned activities, and accomplishments.

7. Will the data be used for any other purpose?

- Yes
 No. If NO, go to question 9

7.1. What are the other purposes?

8. Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President

- Yes
 No

9. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e. aggregating farm loans by zip codes in which only one farm exists.)?

- Yes
 No. If NO, go to question 11

9.1. Will the new data be placed in the individual's record (customer or employee)?

- Yes
 No

9.2. Can the system make determinations about customers or employees that would not be possible without the new data?

- Yes
 No

9.3. How will the new data be verified for relevance and accuracy?

10. Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?

11. Will the data be used for any other uses (routine or otherwise)?

- Yes
 No. If NO, go to question 13

11.1. What are the other uses?

12. Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?

- Yes
 No. If NO, go to question 14

12.1. What controls are in place to protect the data and prevent unauthorized access?

System roles have been established to control the level of use and access to data. System roles are administered on a local, geographic, and national basis and limits the actions a user can conduct and information a user can view. Identification and Authentication policy and procedures are also in place (users have eAuthentication accounts).

13. Are processes being consolidated?

- Yes
 No. If NO, go to question 14

13.1. What controls are in place to protect the data and prevent unauthorized access?

DATA RETENTION

14. Is the data periodically purged from the system?

- Yes
 No. If NO, go to question 16

14.1. How long is the data retained whether it is on paper, electronically, in the system or in a backup?

On-going data retention, but individual plans have planning horizons at which time the plans must be revised or become inactive.

14.2. What are the procedures for purging the data at the end of the retention period?

Inactive plans are flagged inactive, but not permanently removed from the WebDET geodatabase. State administrators will conduct an annual review of all plans in the WebDET geodatabase for their state. Any plans that have been classified as inactive for more than two years will be deleted from the database. This procedure is documented in the WebDET user manual.

14.3. Where are these procedures documented?

This procedure is documented in the WebDET user manual.

15. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?

The plan preparer enters the date of the plan, the next visit, the plan horizon, and planned activities with a planned schedule. All plans that are current – or active—as specified by the plan start and end dates will be considered sufficiently accurate, relevant, timely and complete. Advanced queries can be run to generate reports of active vs. inactive plans.

16. Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?

- Yes
 No

DATA SHARING

17. Will other agencies share data or have access to data in this system (i.e. international, federal, state, local, other, etc.)?

- Yes
 No. If NO, go to question 19

17.1. How will the data be used by the other agency?

17.2. Who is responsible for assuring the other agency properly uses of the data?

18. Is the data transmitted to another agency or an independent site?

- Yes
 No. If NO, go to question 20

18.1. Is there the appropriate agreement in place to document the interconnection and that the PII and/or Privacy Act data is appropriately protected?

19. Is the system operated in more than one site?

- Yes
 No. If NO, go to question 21

19.1. How will consistent use of the system and data be maintained in all sites?

DATA ACCESS

20. Who will have access to the data in the system (i.e. users, managers, system administrators, developers, etc.)?

Access to data is authorized through systems roles. All WebDET roles can access data in the application but extent is controlled by the level of privileges assigned to that specific role.

21. How will user access to the data be determined?

Access to the system is available only by username and password using the USDA eAuthentication system. Once authenticated, access to data is through appropriate system roles. Roles are requested by state administrators, activated by national administrators. Electronic access to records is controlled through system roles.

21.1. Are criteria, procedures, controls, and responsibilities regarding user access documented?

- Yes
 No

22. How will user access to the data be restricted?

System roles have been established to control the level of use and access to data. System roles are administered on a local, geographic, and national basis and limits the actions a user can conduct and information a user can view. Identification and Authentication policy and procedures are also in place (users have Level 2 eAuthentication accounts).

22.1. Are procedures in place to detect or deter browsing or unauthorized user access?

- Yes
 No

23. Does the system employ security controls to make information unusable to unauthorized individuals (i.e. encryption, strong authentication procedures, etc.)?

- Yes
 No

CUSTOMER PROTECTION

24. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e. office, person, departmental position, etc.)?

Helen Butalla as the WebDET ISSO will ensure that security controls are planned, implemented, and updated throughout the system life cycle. She will prepare and update the System Security Plan (SSP) as needed.

25. How can customers and employees contact the office or person responsible for protecting their privacy rights?

Included on the SAP/WebDET webpage is a link to USDA Privacy Policy, providing all necessary information to contact the appropriate office and responsible party.

26. A “breach” refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?

- Yes. If YES, go to question 28
 No

26.1. If NO, please enter the POAM number with the estimated completion date:

27. Consider the following:

- Consolidation and linkage of files and systems
- Derivation of data
- Accelerated information processing and decision making
- Use of new technologies

Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?

- Yes
 No. If NO, go to question 29

27.1. Explain how this will be mitigated?

28. How will the system and its use ensure equitable treatment of customers?

Decisions regarding equitable treatment of customers and employees are not a part of this system.

29. Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?

- Yes
 No. If NO, go to question 31

29.1. Explain

SYSTEM OF RECORD

30. Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?

- Yes
 No. If NO, go to question 32

30.1. How will the data be retrieved? In other words, what is the identifying attribute (i.e. employee number, social security number, etc.)?

30.2. Under which Systems of Record notice (SOR) does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov)

30.3. If the system is being modified, will the SOR require amendment or revision?

TECHNOLOGY

31. Is the system using technologies in ways not previously employed by the agency (e.g. Caller-ID)?

- Yes
 No. If NO, the questionnaire is complete.

31.1. How does the use of this technology affect customer privacy?

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO
THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE/CYBER SECURITY

Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

WERDET AND WINDET

(System Name)

This document has been completed in accordance with the requirements of the EGovernment Act of 2002.

Karl R. Dull
System Manager/Owner
OR Project Representative
OR Program/Office Head.

11/07/08
Date

[Signature]
Agency's Chief FOIA officer
OR Senior Official for Privacy
OR Designated privacy person

11/07/08
Date

[Signature]
Agency OCIO

11-13-2008
Date

Revision and History

Document Version #	Revision Date	Description of Change	Section #/Paragraph #	Page #	Initials